

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED
SUPPRESSED
FEB 6 2020
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS J. SANCHEZ,

Defendant.

No.

4:20CR00091 RWS/DDN

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));

(b) "sexually explicit conduct" to mean actual or simulated

(i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.

§ 2256(2)(A)); and

(c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

(d) “child pornography” to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(B) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about January 1, 2018, and on or about April 29, 2019, in the Eastern District of Missouri, and elsewhere,

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the defendant herein, did knowingly possess material that contained image files and video files of child pornography that was transported using any means or facility of interstate and foreign commerce, affected interstate commerce by any means and was produced using materials that traveled in and affecting interstate and foreign commerce, to wit the defendant knowingly downloaded, stored and viewed image files and video files of child pornography via the internet

and on a Hewlett-Packard laptop, serial number: 5CB1297B26, to include but not limited to the following:

- a. “[001106].mpg,” a graphic video file depicting a prepubescent minor child exhibiting her genitals and inserting an object into her vagina;
- b. “\$REHEEC0.mp4,” a graphic video file depicting a prepubescent minor child exhibiting her genitals and an adult hand touching her genitals with fingers and with an object;
- c. “1_4922799009669578808.mp4,” a graphic video file depicting a prepubescent minor with her mouth on an adult male’s penis;
- d. “dog_reactions.mp4,” a graphic video file depicting a prepubescent minor engaging in vaginal intercourse with a canine;
- e. “assfuck compilation.wmv,” a graphic video file depicting a prepubescent minor’s anus being penetrated by an adult male’s penis; and
- f. “VID-20180405-WA0108.mp4.mpg,” a graphic video file depicting a prepubescent minor child whose vagina is being penetrated by an adult penis;

in violation of 18 U.S.C. § 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

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